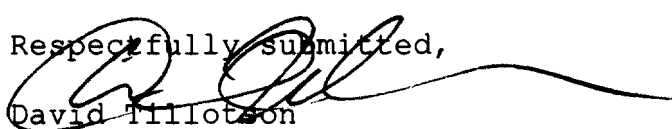


its application is the epitome of a rule that is arbitrary and capricious. Accordingly, Petitioners submit that the Main Studio Rule should be amended simply to require that all stations have a main studio that is reasonably accessible to the residents of their communities of license. Petitioners believe that licensees should be left with broad discretion to determine, based upon the circumstances of the markets in which they operate, what would constitute a "reasonably accessible" location just as they are left with broad discretion to determine the nature, quantity and scheduling of the programming that they present to fulfill their obligation to operate in the public interest. However, if the Commission believes that the term "reasonably accessible" would leave too much discretion for selecting a main studio location with licensees, it might define "reasonably accessible" as "a location that is not more than 30 minutes driving time, under normal conditions, from a station's community of license."

It has been shown in the discussion above that the requirement of the Public File Rule that stations which do not have a main studio in their community of license maintain their public file at a location in their community of license not only does not serve the public interest, but it disserves the public interest by placing the public file at a location where there will be no one available to assist persons inspecting the file in locating and understanding documents and by creating situations where persons

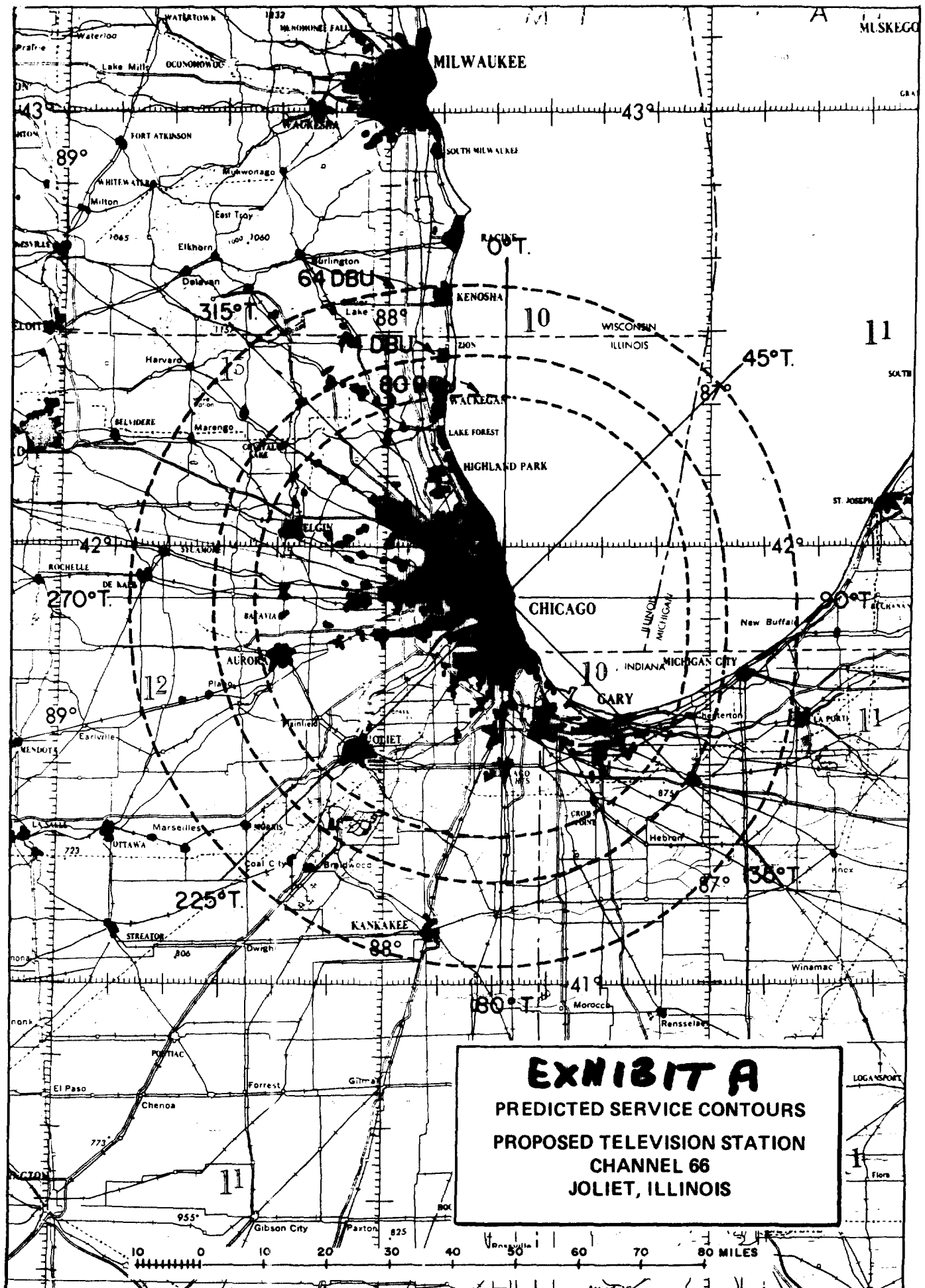
who come to a station's main studio to inspect the public file will be inconvenienced by being sent elsewhere to inspect it. Petitioners submit that the public interest would be well served by amending the public file rule to require that all stations maintain their public file at their main studio unless the station is not on the air, in which event the public file should be maintained at a suitable location within the station's community of license.

Respectfully submitted,



David Tillotson
Attorney for Petitioners

July 8, 1996



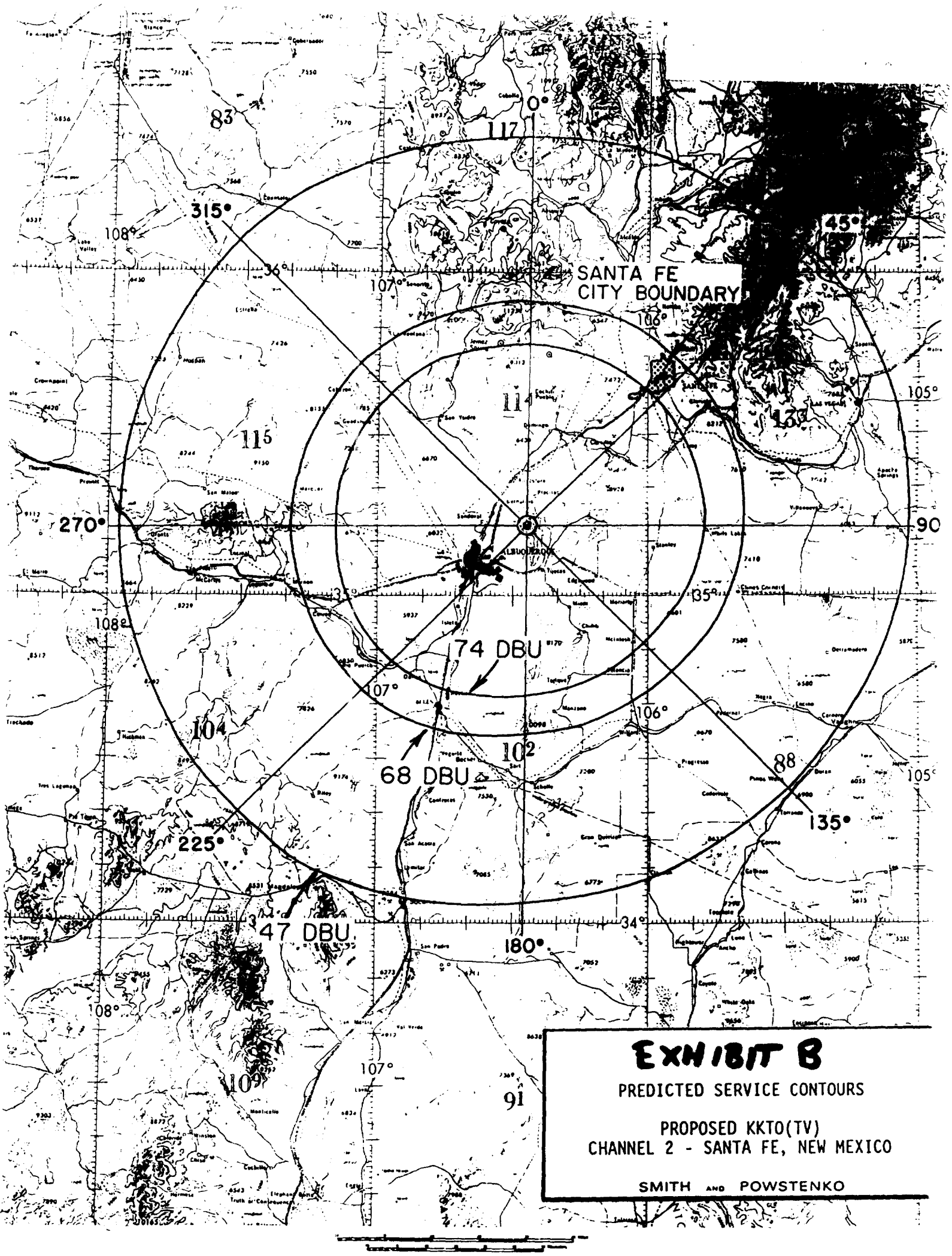


EXHIBIT B
PREDICTED SERVICE CONTOURS
PROPOSED KKTO(TV)
CHANNEL 2 - SANTA FE, NEW MEXICO
SMITH AND POWSTENKO

EXHIBIT C

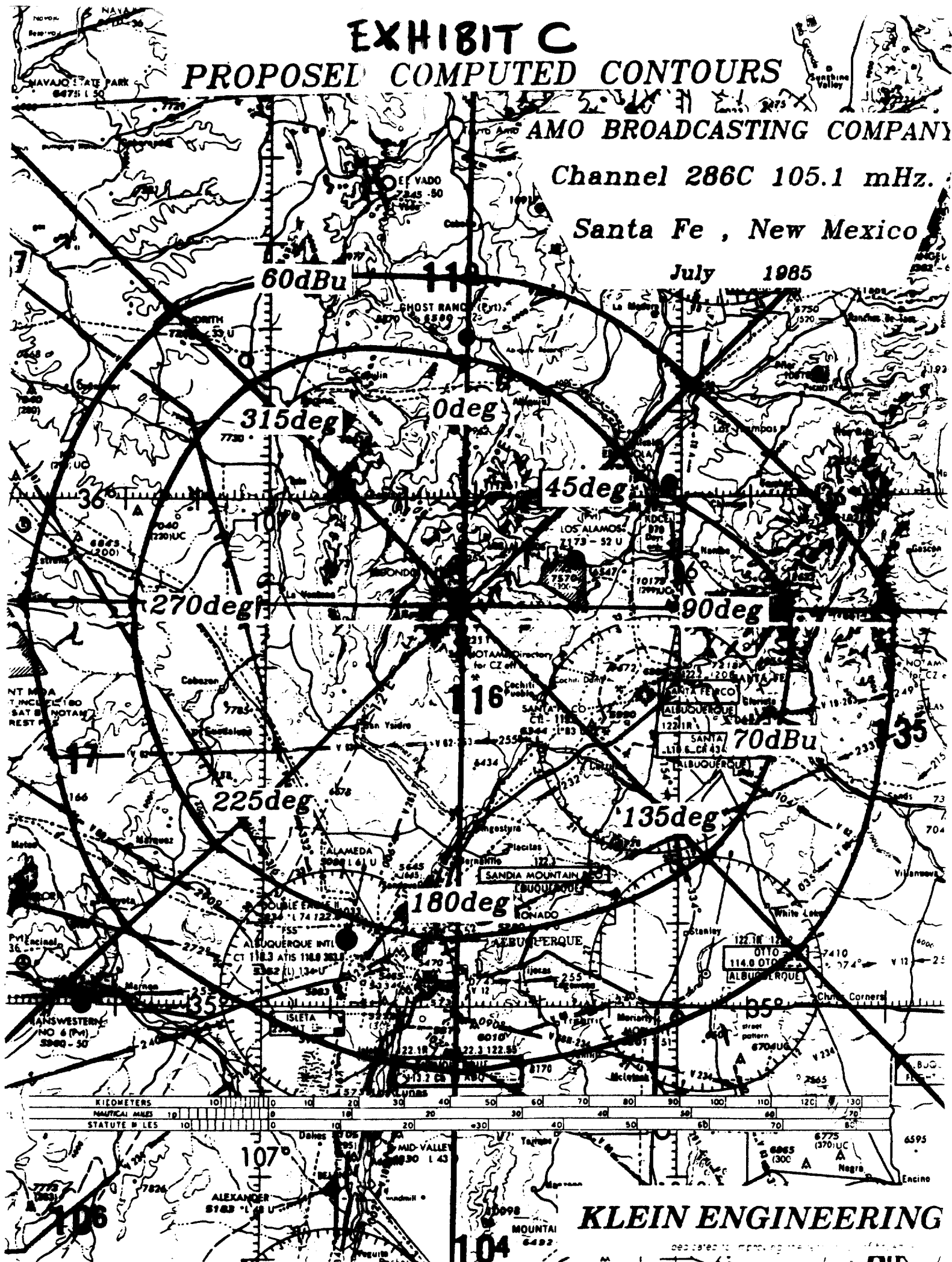
PROPOSED COMPUTED CONTOURS

AMO BROADCASTING COMPANY

Channel 286C 105.1 mHz.

Santa Fe, New Mexico

July 1985



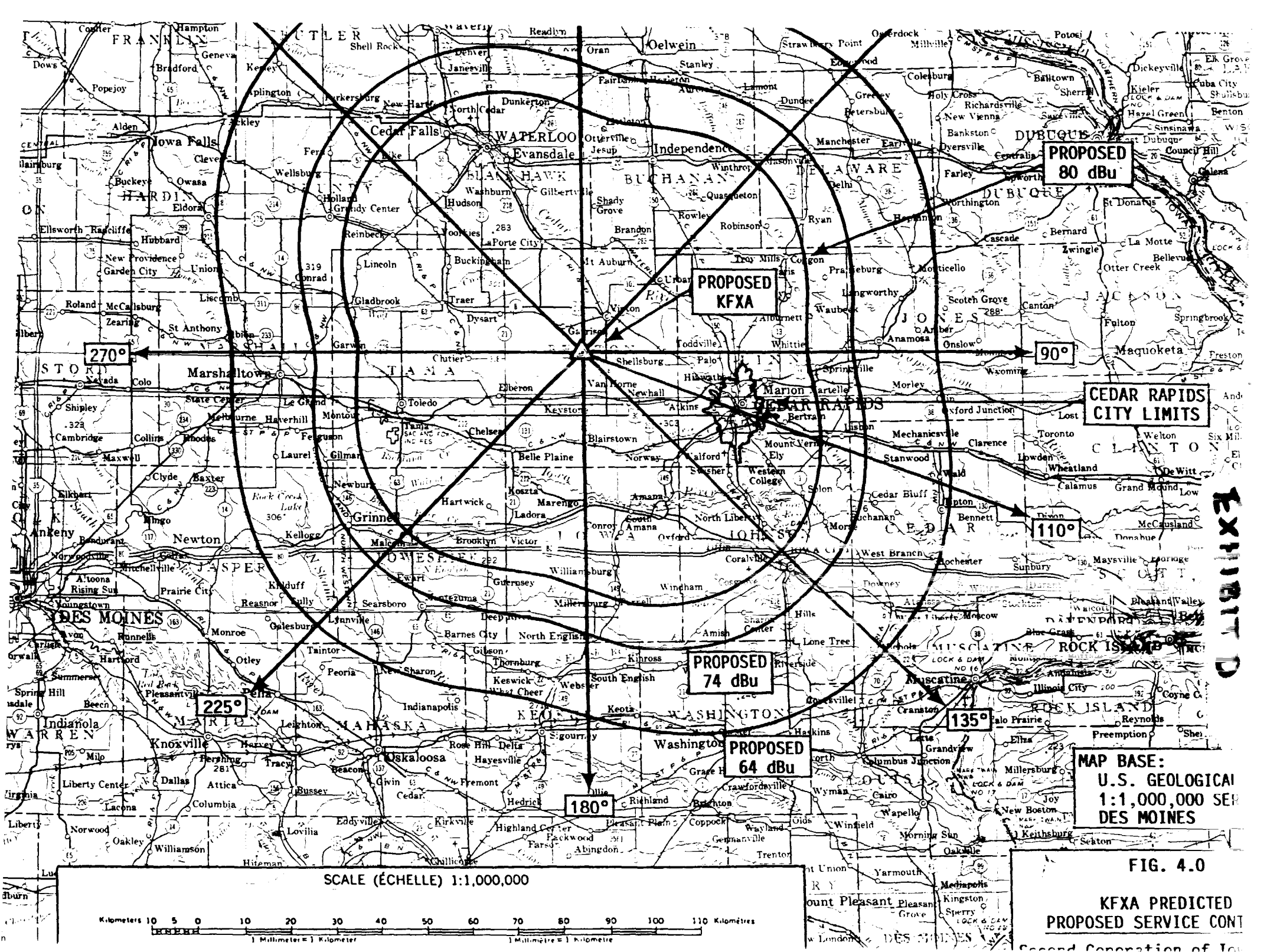


FIG. 4.0

KFXA PREDICTED
PROPOSED SERVICE CONT

Second Generation of Iowa

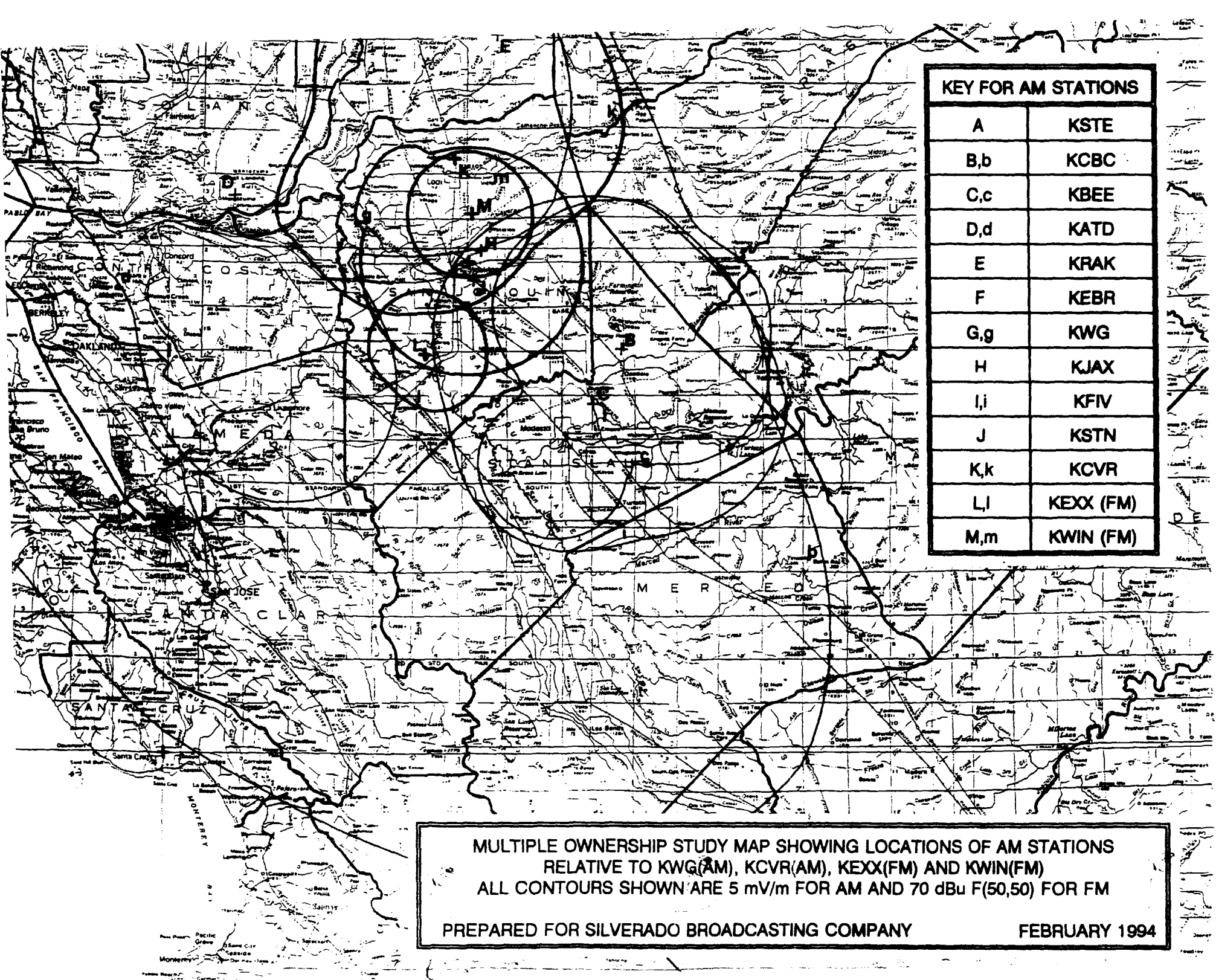
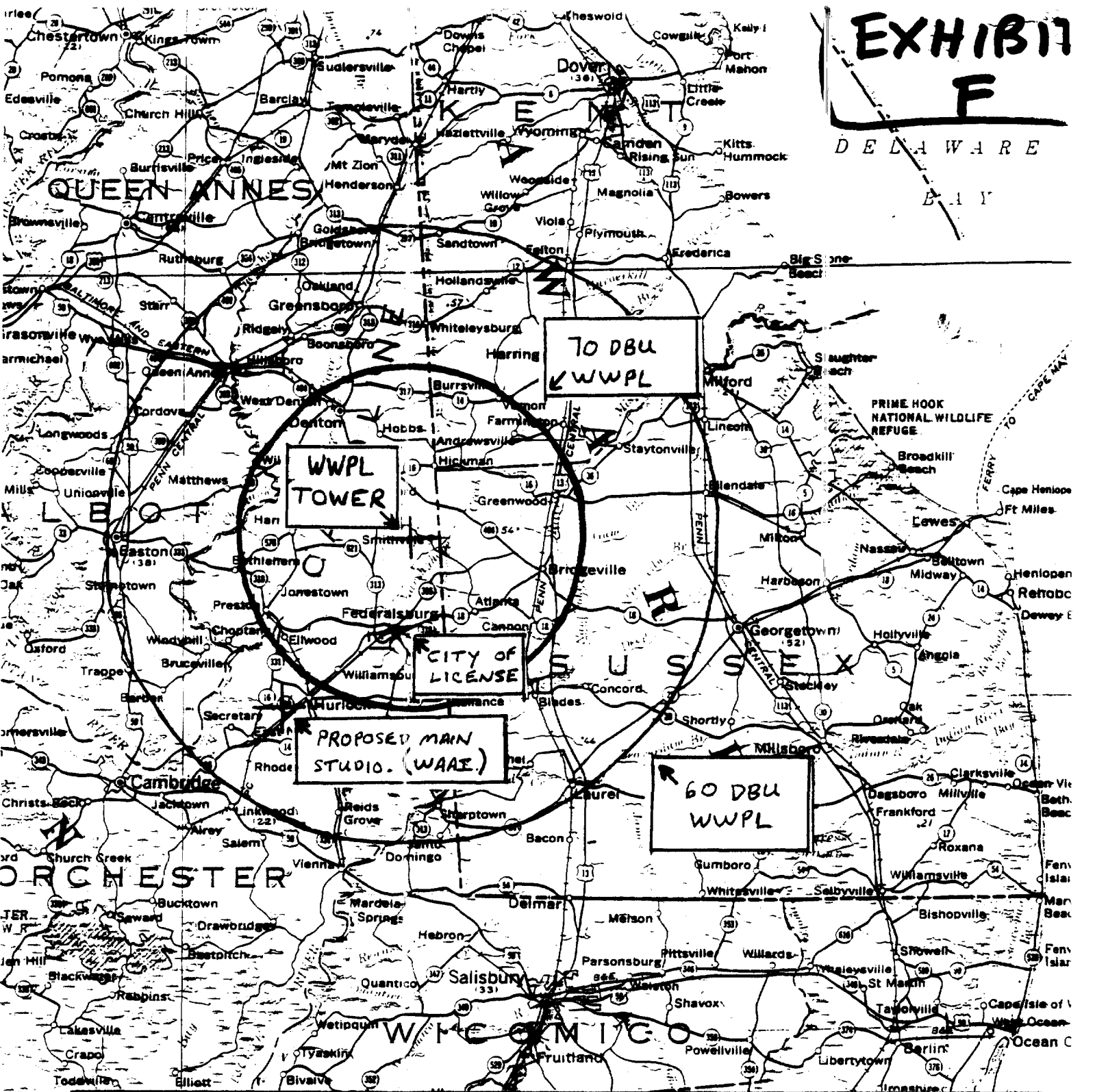


EXHIBIT E

EXHIBIT F

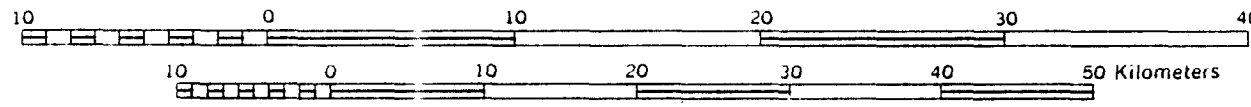
DELAWARE

E 1 Y



Scale 1:500,000

1 inch equals approximately 8 miles



Lambert conformal conic projection
Standard parallels 33° and 45°

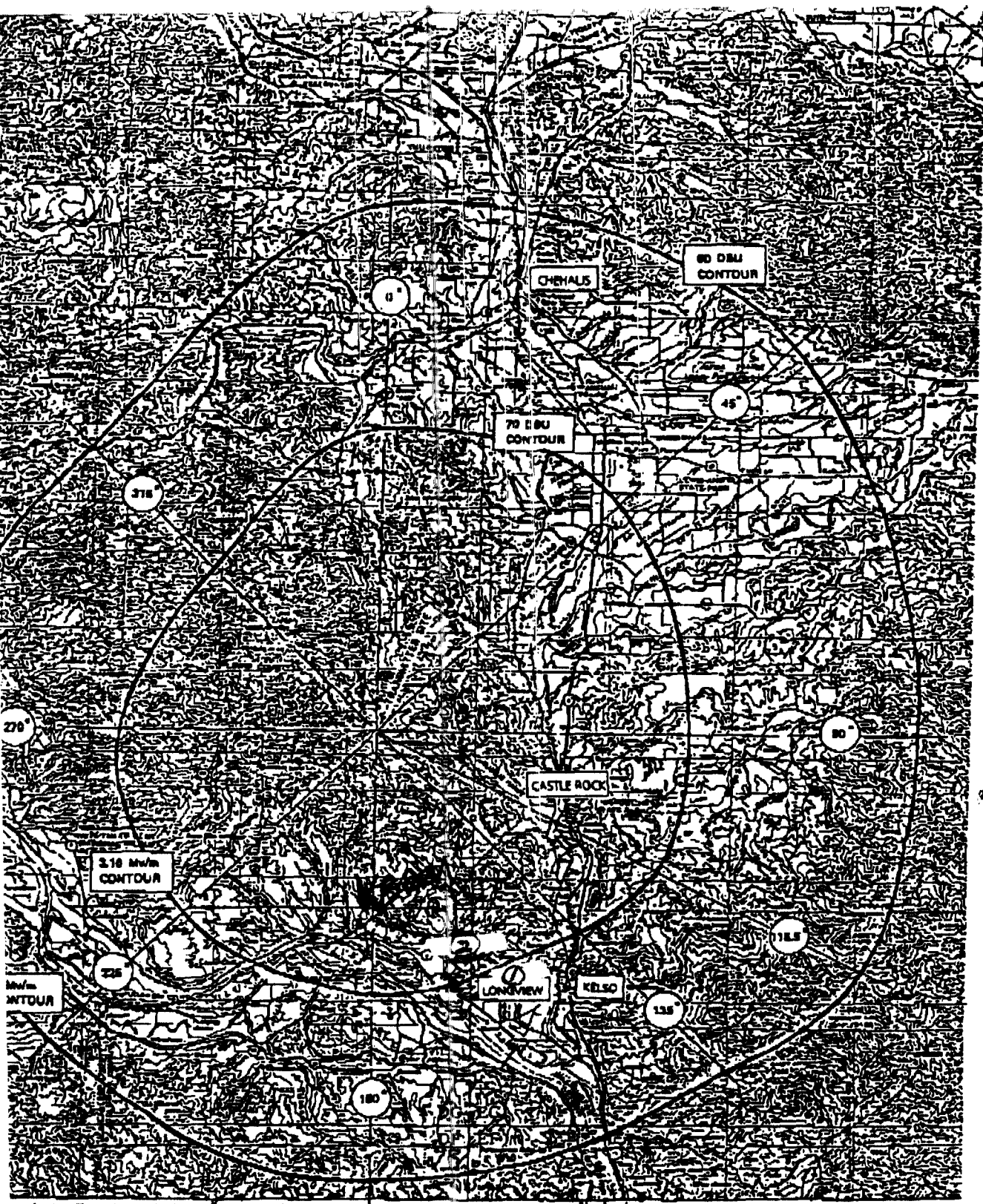
Contour interval 200 feet

National geodetic vertical datum of 1929

FOR SALE BY U. S. GEOLOGICAL SURVEY, RESTON, VIRGINIA 22092

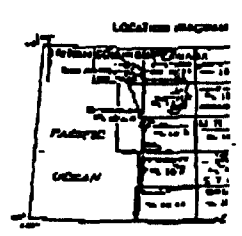


EXHIBIT 6



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 100. Contour lines

Scale 1:50,000	
FM CHANNEL 298 □ 107.1 MHz	
EXHIBIT No. 6 SERVICE CONTOURS	
ARMAX BROADCASTING, INC. - CASTLE ROCK, WASHINGTON - May 7, 1982	



KBAM Trans Site (2)
 KBAM Studio Site (1)